

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE MANAGEMENT GROUP, LLC, ANDREW
FOX, and LEE HEJMAN,

Plaintiffs,

- against -

ANGEL MUSIC GROUP LTD., NEIL MOFFITT,
NICK McCABE, JESSIE ANGLES, ANU DHAMI,
ISABEL PIAGGI, and DAN A. VIDAL,

Defendants.
----- x

08-02172(PKC)

**AFFIDAVIT OF ANU DHAMI
IN SUPPORT OF MOTION TO DISMISS**

STATE OF NEVADA)
)
COUNTY OF CLARK)

SS.:

ANU DHAMI, being duly sworn, says:

1. I am a citizen of the United Kingdom and a resident of the State of Nevada. I reside at 56 E. Serene Ave, Apt 216, Las Vegas, NV 89123. I was served with the complaint in this action on March 14, 2008.

2. The complaint against me should be dismissed for lack of personal jurisdiction. I do not live in New York. I do not own property in New York. I do not work in New York. I never contracted to deliver any good or service in New York. I did no tortious act that had an effect in New York. I transact no business in New York.

3. The complaint against me alleges a number of common-law causes of action arising out of my departure from the employment of Plaintiff The Management Group, LLC ("TMG") and my joining Defendant Angel Music Group, Ltd. ("Angel").

4. Both TMG and Angel manage musical artists on a worldwide basis. I worked for TMG from October 2nd 2006 until November 21st 2007 as a West Coast Regional Manager. I had no employment contract with TMG during my employment there. At all times during my employment with TMG I was located in the State of California. I delivered services to TMG from the office in California to its worldwide client base. I did not travel to New York for business and did not otherwise avail myself of this jurisdiction for any purpose.

5. I communicated with employees of TMG in New York and elsewhere as part of my duties, but as shown in the accompanying memorandum of law, this is insufficient to support jurisdiction in New York.

WHEREFORE, the motion to dismiss the complaint as against me should be granted.

April 7, 2008

KARAAHMETOGLU & LUZ FIRM LLP

By: /s/
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Vidal*


Anu Dhami

State of Nevada
County of Clark

Signed and sworn to (or affirmed)
before me on 4/4/2008 by Anu Dhami

(Notary Stamp)


(Signature of notarial officer)

